IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

JOHN	DOE.

Plaintiff,

v.

Case No. 3:21-cv-4108-MGL

ALAN WILSON, in his official capacity as Attorney General of South Carolina; and MARK KEEL, in this official capacity as Chief of the South Carolina State Law Enforcement Division,

Defendants.

Joint Stipulation and Request for Entry of Order

Plaintiff John Doe and Defendants Alan Wilson and Mark Keel respectfully stipulate to and request this Court enter a permanent injunction in this matter. In support, they state:

- 1. On December 22, 2021, Plaintiff—proceeding pseudonymously as John Doe—filed this action challenging his inclusion on the South Carolina Sex Offender Registry for a 2001 conviction under South Carolina's Buggery prohibition, South Carolina Code § 16-15-120, as well as facially challenging the Buggery statute as unconstitutional.
- 2. The Parties have agreed to a resolution of this matter and submit a proposed order with this joint stipulation and request.

Dated: April 12, 2022

Respectfully submitted,

[Signature Blocks on Following Page]

ALLEN CHANEY

Federal ID No. 13181

D. Allen Chancy

American Civil Liberties Union Foundation of South Carolina

P.O. Box 1668

Columbia, South Carolina 29202

Telephone: (843) 282-7953 Email: achaney@aclusc.org

Counsel for Plaintiff

Dated: April 12, 2022

s/ L. David Leggett

L. DAVID LEGGETT

Assistant Attorney General Federal ID No. 13239

Email: DavidLeggett@scag.gov

Post Office Box 11549

Columbia, South Carolina 29211

Phone: (803) 734-3177 Fax: (803) 734-3677

Counsel for Defendants